

1 TONY WEST
2 Assistant Attorney General
3 JOHN R. TYLER
4 ISAAC R. CAMPBELL
5 United States Department of Justice
6 Civil Division, Federal Programs Branch
7 20 Massachusetts Avenue, NW, Room 6130
8 Washington, D.C. 20530
9 Tel: (202) 616-8476
10 Fax: (202) 616-8460
11 isaac.campbell@usdoj.gov
12
13 Attorneys for Defendant Department of Homeland Security

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 AMERICAN CIVIL LIBERTIES UNION OF)
18 NORTHERN CALIFORNIA and)
19 LAWYERS COMMITTEE FOR CIVIL RIGHTS)
20 OF THE SAN FRANCISCO BAY AREA,)

21 Plaintiff,

22 v.

23 DEPARTMENT OF HOMELAND)
24 SECURITY,)

25 Defendant.)
26)
27)
28)

PJH 08-2744

**STIPULATED REQUEST FOR AN
ORDER STAYING THE CURRENT
BRIEFING SCHEDULE AND
ENLARGING THE TIME FOR THE
PARTIES TO ENGAGE IN
SETTLEMENT NEGOTIATIONS**

29 Pursuant to Civil L.R. 6-2, the parties, through undersigned counsel, hereby stipulate to a stay
30 of the current briefing schedule and an enlargement of time of 60 days for the parties to continue
31 settlement negotiations.¹ As grounds for this stipulation, Defendant states as follows:

32 1. On April 20, 2009, the parties filed a stipulation seeking an enlargement of time of 30
33 days for the defendant to move for summary judgment in order to afford the parties the opportunity to
34 engage in settlement discussions.

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¹ Defendant's summary judgment motion is currently due on May 26, 2009.

2. While the settlement negotiations have been progressing during this time, certain issues remain unresolved.

3. The parties seek additional time in order to resolve, if possible, any outstanding issues and to settle this matter amicably, without the need for further litigation.

4. Accordingly, the parties seek an additional 60 days to complete its settlement negotiations, and to report back to the Court at that time to inform the Court of the status of settlement. The parties therefore ask that the current summary judgment briefing schedule be stayed during this period to allow both sides to be fully engaged in settlement negotiations. The parties propose that they provide a joint report to the Court regarding the status of settlement negotiations by no later than July 31, 2009.

6. This stipulation is supported by the Declaration of Isaac Campbell, filed herewith.

For the reasons set forth above, and in the Declaration of Isaac R. Campbell, the parties hereby move for an order granting a stay of the current briefing schedule, an enlargement of time of 60 days for the parties to continue settlement negotiations, and to provide a joint report to the Court on or before July 31, 2009.

Dated: May 21, 2009

/s/ Isaac R. Campbell
JOHN R. TYLER
ISAAC R. CAMPBELL
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, NW, Rm
6130
Washington, DC 20530
Tel: (202) 616-8476
Fax: (202) 616-8460

Attorneys for Defendants

/s/ Rocky Tsai
KATHLEEN D. PATTERSON (CA SBN 124768)
ROCKY TSAI (CA SBN 221452)
RUTH KWON (CA SBN 232569)
MARIKO MIKI (CA SBN 244920)
ERIN REDING (CA SBN 252691)
MICHELLE LEUNG (CA SBN 252937)
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Tel: (415) 773-5700
Fax: (415) 773-5759
Attorneys for Plaintiff

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 26, 2009

Honorable Phyllis J. Hamilton



5/21/09 Stip. Req. For Order Changing Time of Due Date of Def's Summ. Judg. Mot. 08-2744 (PJH)